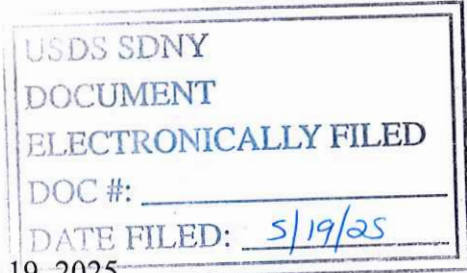


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• ADMITTED IN FEDERAL AND
NEW YORK STATE COURTS



May 19, 2025

VIA ECF All Parties

Honorable. Kimba M. Wood
United States District Judge
United States Court House
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *USA v. Wolfe Margolies*, 19-cr-00178, KMW/1:22-cv-03489-KMW

Dear Judge Wood;

I respectfully request a twenty-one (21) day extension of time to file my brief in the above-referenced matter, which is currently due on May 21, 2025. This constitutes my second request for an extension in this case. Granted

On April 2, 2025, I concluded a twelve-week trial that required my full attention and significantly limited my ability to prepare the brief in this matter. On April 30, 2025, I commenced another trial, *People of the State of New York v. Joshua Mitchell*, Ind. No. 71086/21. A verdict in that matter was rendered on May 8, 2025. During this period, I received the unfortunate news of the death of a close family member. This loss has required me to attend to urgent family matters and funeral arrangements, further impacting my ability to meet the current filing deadline.

I have conferred with counsel for the Government, who has indicated they do not object to this request.

I assure the Court that this extension is not sought for purposes of delay, but rather to ensure that I can provide the Court with a thorough and well-prepared brief that will assist in resolving the issues presented in this case. Additionally, this extension would allow me the necessary time to thoroughly review the brief with my client to ensure all pertinent issues are properly addressed.

Thank you for Your Honor's consideration of this request.

*The Court extends the time
to file the brief to June 19, 2025*

Respectfully submitted,

Alain V. Massena

Alain V. Massena, Esq.

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SO ORDERED: N.Y., N.Y.

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.